

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN OF PENNSYLVANIA**

<b>IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION LITIGATION</b>	§ § § § § § § § § §	<b>No. 12-md-2323 (AB)</b>  <b>MDL No. 2323</b>
<b>THIS DOCUMENT RELATES TO: ALL ACTIONS</b>		

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**RESPONSE IN OPPOSITION AND OBJECTIONS TO CO-LEAD CLASS  
COUNSELS' PETITION FOR AWARD OF ATTORNEYS' FEES,  
REIMBURSEMENT OF COSTS AND EXPENSES, ADOPTION OF A SET-  
ASIDE OF FIVE PERCENT OF EACH MONETARY AWARD AND  
DERIVATIVE CLAIMANT AWARD, AND CASE CONTRIBUTION  
AWARDS TO CLASS REPRESENTATIVES**

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Settlement Class Members Melvin Aldridge, Trevor Cobb, Jerry W. Davis, Michael Dumas, Corris Ervin, Robert Evans, Anthony Guillory, Wilmer K. Hicks, Jr., Richard Johnson, Ryan McCoy, Emanuel McNeil, Robert Pollard, Frankie Smith, Tyrone Smith, James A. Young Sr., and Baldwin Malcom Frank (collectively, the "Alexander Objectors")<sup>1</sup> file this Response in Opposition and Objections to Co-Lead Class Counsels' Petition for Award of Attorneys' Fees, Reimbursement of Costs and Expenses, Adoption of a Set-Aside of Five Percent of Each Monetary Award and Derivative Claimant Award, and Case Contribution Awards to Class Representatives (the "Petition") (ECF No. 7151). In short, Co-

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<sup>1</sup> A Declaration of Representation is attached hereto as Exhibit A.

Lead Counsels' Petition is (i) premature; (ii) conclusory and lacking in substantiating data and evidence; and (iii) based on guesswork and flawed methodologies. For these reasons, and the reasons more fully set forth in the accompanying memorandum of law, the Court should deny or defer Co-Lead Counsels' Petition.

Date: March 27, 2017

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served on all counsel of record via the Court's ECF system on March 27, 2017.

/s/ Justin R. Goodman  
Justin R. Goodman